REMARKS

This Response is submitted in reply to the Final Office Action dated December 2, 2009. Claims 1, 4, 7-24, 27, 30-32 and 34-41 are pending in this application. Claims 1, 4, 7-24, 27, 30-32 and 34-41 are rejected. Applicants respectfully submit the rejections are improper and should be withdrawn for at least the reasons set forth below.

Rejections under 35 U.S.C. 102

The Office Action rejected Claims 1, 4, 7-24, 27, 30-32, and 34-37 as being anticipated by U.S. Patent No. 5,652,896 to Yamauchi et al. ("Yamauchi"). Applicants thank the Examiner for further clarifying the rational behind the rejection in the Office Action. However, Applicants respectfully disagree and traverse the rejection.

Applicants maintain that Yamauchi fails to disclose or suggest "re-converting the confirmed at least one representation to a re-converted representation within the same first natural language by exchanging word order of the at least one representation" as claimed in independent Claim 1 and similarly claimed in independent Claims 17, 27, and 31.

The Examiner states "[i]t is explicitly illustrated in Fig. 74, the word order of the source language, (not changed words, as it is an alternate pattern citation, not alternate/edited words), have been alternated, the positioning changed. Furthermore, Yamauchi, in describing Fig. 74, (C.39 lines 25-33) explicitly teach the source language to correspond to information in a target language." Office Action, pages 3-4. "Fig. 42-44 illustrate his alternative pattern, which contain a re-converted representation, wherein the representation is converted to a re-converted representation by exchanging word order of the least one representation, his '(<Pattern>)(|test|<SOMETHING>)' and his '(<AltPat>)(<SOMETHING>|be tested|),' each pattern within Fig. 42 comprises re-converted pattern, wherein the word order is exchanged. In Fig. 74 the word order is thus exchanged, between the different patterns, and thus the representation is thus exchanged." Office Action, pages 8-9 (emphasis removed).

Applicants agree that Yamauchi teaches a source language (Japanese) corresponds to information in a target language (English). However, Applicants respectfully disagree that Yamauchi teaches a selected source language representation is re-converted into a re-converted source language representation using Yamauchi's Pattern and/or AltPat, or by any other method. Specifically, Applicants submit that Yamauchi i) column 50, lines 4-57, ii) Figs. 42-44, and iii) Fig. 74, as relied on by the Examiner, fail to teach the claimed "re-converting."

I. Embodiment disclosed at Yamauchi, column 50, lines 4-57

The Examiner relies, in part, on Yamauchi, column 50, lines 34-45, to teach the claimed "converting the first natural language inputted by the input means into a plurality of representations within the same first natural language." See Office Action, page 6. Specifically, Yamauchi discloses that after an initial source-language sentence is entered, multiple source-language sentences are created based on source-language patterns (J-PATTERN). Yamauchi, column 50, lines 7-14, 34-37. For example, the following representing patterns can be used:

<v-|test|-000>,
<v-|test|-001>,
<v-|test|-002>, and
<v-|test|-003>.

Yamauchi, column 50, lines 18-22. Each representing pattern contains a target-language representing pattern (PATTERN) and a source-language representing pattern (J-PATTERN). For example, representing pattern <v-|test|-000> consists of the following:

<v-|test|-000>	
PATTERN	((X0 ltest| X1))
COMPONENT	((X0 #AGENT#) (X1 #OBJECT#)
EXAMPLE	((<SOMEONE> TESTS <SOMETHING>))
J-PATTERN	((X0 ga X1 wo testosuru))

Yamauchi, column 49, lines 5-10. Thus, a source language pattern (J-PATTERN) corresponds to a target-language pattern (PATTERN) because they both are included in the same representing pattern (e.g. <v-|test|-000>).

As can be seen, the J-PATTERN of <v-|test|-000> was used to create the first of the four sentences below which, as understood, are used to teach the claimed "a plurality of representations within the same first natural language":

"<koisha> ga hendensho wo tesutoshita".
"<koisha> ga <jotai> no tameni hendensho wo tesutoshita",
"<koisha> ga <jotai> no tameni hendensho no tesuto wo okonatta", and
"<koisha> ga <jotai A ka B> wo kimerutameni hendensho no tesuto wo jisshishita".

Yamauchi, column 50, lines 38-45.

At this point, a user has the option of selecting (or editing and selecting) one of the four sentences. Yamauchi, column 50, lines 46-48. As understood, the Examiner relies on selecting

one of the four sentence to teach the claimed "confirming at least one representation converted by the converting means." See Office Action, page 7, last paragraph.

It is at this point, after a source-language sentence is selected (i.e. confirmed), that Yamauchi allegedly teaches the claimed "re-converting." However, Yamauchi merely discloses that once a sentence is selected (e.g. <koisha> ga hendensho wo tesutoshita), a representing pattern (e.g. <v-|test|-000>) corresponding to the selected source-language sentence is decided. Yamauchi, column 50, lines 46-48. A target-language sentence is then created based on the target-language pattern (PATTERN) within the decided on representing pattern (e.g. <v-|test|-000>).

As can be seen, the selected source-language sentence (e.g. <koisha> ga hendensho wo tesutoshita) is ***not re-converted*** into a "re-converted representation within the same first natural language by exchanging word order" according to this embodiment. Instead, the selected source-language sentence is merely used to determine what representing pattern to use (e.g. <v-|test|-000>), which in turn is used to determine what target-language pattern (PATTERN) is used to make a target-language sentence.

II. Embodiment disclosed at Yamauchi, Figs. 42-44

The Examiner references Figs. 42-44 showing an embodiment of Yamauchi where a representing pattern further includes an alternative target-language pattern (AltPat). See Fig. 42. Thus, when the embodiment of Fig. 42 is combined with the embodiment taught at column 50 as described above, a representing pattern (e.g. <v-|test|-000>) includes a target-language pattern (PATTERN), an alternative target-language pattern (AltPat), and a source-language pattern (J-PATTERN).

However, Applicants submit that the alternative target-language pattern (AltPat) is not used to re-convert a source-language sentence. Instead, once a source-language sentence is selected (e.g. <koisha> ga hendensho wo tesutoshita), a representing pattern (e.g. <v-|test|-000>) corresponding to the selected source-language sentence is decided. Yamauchi, column 50, lines 46-48. However, different from the embodiment described at column 50, the representing pattern does not only include one possible target-language pattern. Rather, the representing pattern now includes both PATTERN and AltPat. One of PATTERN and AltPat is chosen to be used to create the target-language sentence.

For example, Fig. 44 shows a source-language sentence J3 that is to be translated into a target-language sentence. Fig. 45 shows a target-language sentence E03 that used PATTERN to translate J3. Alternatively, Fig. 46 shows a different target-language sentence E03 that used AltPat to translate J3. See Yamauchi, column 30, line 37 – column 31, line 52.

Thus, one of PATTERN and AltPat is chosen and used to translate the selected source-language sentence into a target-language sentence. PATTERN and AltPat are ***not used to re-convert*** a Japanese source-language sentence into a "re-converted representation within the same first natural language by exchanging word order" as claimed.

Moreover, PATTERN is never re-converted into AltPat or vice versa. PATTERN and AltPat merely represent two target-language patterns that can be used for translation. Additionally, Yamauchi specifically states PATTERN and AltPat are in the English target-language, and not in the Japanese source-language. "<Pattern>: This indicates ***English*** words grammatically appropriate, default values and a unit of the arrangement of other phrase patterns... <AltPat>: This indicates another arrangement of the same items as those in <Pattern>." Yamauchi, column 30, lines 40-52 (emphasis added). Yamauchi is silent regarding an alternative source-language pattern (i.e. an alternative J-Pattern) that could be used to re-convert the selected source-language sentence into a re-converted source-language sentence.

III. Yamauchi, Fig. 74

The Examiner also references Fig. 74 as showing word order is exchanged between sentences in the source language. See Office Action, pages 8-9. As understood, the Examiner seems to suggest that Fig. 74 illustrates p1 is re-converted into p2, p3, or p4. Applicants submit this is not the case and p1 is not re-converted into one of p2-p4. Moreover, p1-p4 do not represent source-language sentences. Rather, p1-p4 represent target-language patterns with inserted Japanese nouns (i.e an intermediate between a target-language pattern and a target-language sentence). The inserted Japanese nouns were extracted from the selected source-language sentence, but p1-p4 are not source language sentences themselves. Yamauchi, column 39, lines 13-33.

More specifically, Figs. 73-74 illustrate the process of transforming the target-language pattern (PATTERN) into a target-language sentence. For example, Fig. 73 illustrates that after 1) a user selects a source-language sentence, and 2) a representing pattern has been determined, then one of the target-language patterns (pattern1 – pattern4) is selected. Yamauchi, column 39,

lines 13-23. Each of pattern1 – pattern4 correspond to a different representing pattern (e.g. <v-|test|-001> through <v-|test|-004>). One of pattern1 – pattern4 is selected based on the determined representing pattern.

As shown in Fig. 74, and as asserted by the Examiner, Japanese source-language information (e.g. SOMETHING OR SOMEONE) corresponds to English target-language information. The SOMETHING and the SOMEONE extracted from the Japanese source-language sentence is then placed into the corresponding places of the English target-language pattern (p1-p4 which correspond to pattern1 – pattern4 of Fig. 73). Yamauchi, column 39, lines 24-33. The Japanese SOMETHING and SOMEONE are then translated into the corresponding English words, resulting in a completed English target-language sentence. Therefore, a Japanese source-language sentence is ***not re-converted*** into a "re-converted representation within the same first natural language by exchanging word order" as claimed.

Accordingly, Applicants respectfully request the anticipation rejection with respect to independent Claims 1, 17, 27, and 31, and the claims that depend thereon, be reconsidered and the rejection withdrawn.

Rejections under 35 U.S.C. 103

The Office Action rejected:

i. Claims 38 and 39 under 35 U.S.C. 103(a) as being unpatentable over Yamauchi in view of U.S. Patent No. 5,742,505 to Fushimoto ("Fushimoto"); and

ii. Claims 40 and 41 under 35 U.S.C. 103(a) as being unpatentable over Yamauchi and Fushimoto, and further in view of U.S. Patent No. 5,541,837 to Fushimoto ("Fushimoto II").

Applicants thank the Examiner for responding in detail to Applicants' previous argument relating to Claims 38 and 39 and clarifying how the cited prior art allegedly teaches the claimed subject matter. However, Applicants maintain that the cited prior art fails to disclose or suggest "each of the plurality of representations of the second natural language has a one-to-one correspondence with a representation of a third natural language" as claimed in Claims 38 and 39. In view of the Examiner's detailed response to Applicants' previous argument, Applicants will further clarify why the cited prior fails to teach independent Claims 38 and 39.

The Examiner recognizes that Yamauchi fails to teach "each of the plurality of representations of the second natural language has a one-to-one correspondence with a

representation of a third natural language" and instead relies on Fushimoto to teach this limitation. Office Action, pages 22-23. As understood, the Examiner relies on Fushimoto's translation result of a disambiguation process, which removes possible translations (e.g. "estimer"), to teach the one-to-one to correspondence. Office Action, page 23, lines 6-12. However, Applicants submit that even after Fushimoto's disambiguation process, the translation result consists of multiple words, and does not result in a one-to-one correspondence.

Fushimoto discloses translating a first language (German) to a second language (French) using an intermediate language (English). Fushimoto, column 5, lines 41-44. In a first embodiment, a German word "finden" is translated into a plurality of intermediate English words (e.g. "find" and "discover"). See Fig. 6, columns 61 and 62. Each of the plurality of English words are then translated into a plurality of French words (e.g. "trouver" and "estimer"). See Fig. 6, columns 62 and 63. In the first embodiment, "all the ***words*** in right column 63 are displayed" as the result of the German-to-French translation of the German word "finden." Fushimoto, column 6, lines 37-38. Thus, the German word "finden" does not have a one-to-one correspondence with a representation in the French target language (or the English intermediate language for that matter) in the first embodiment.

In Fushimoto's second embodiment, the translation process described in the first embodiment is taken one step further. Fushimoto, Fig. 8 and column 6, line 50 – column 7, line 23. Each of the plurality of French words generated in the first embodiment are then translated back into English. Fushimoto, Fig. 8, columns 83 and 84. As shown in Fig. 8, if an English word of column 84 matches an English word of column 82, the corresponding French word of column 83 is displayed as the result of the German-to-French translation of the German word "finden." See Fushimoto, Fig. 8 and column 7, lines 3-17. For example, the French words "trouver" and "decouvrir" both correspond to the German word "finden." However, the French word "estimer" has been removed from the translation result because it does not correspond to the same English word in columns 82 and 84. See Fushimoto, Fig. 8 and column 7, lines 3-17. "Only the underlined French ***words*** in Fig. 8 are displayed on the display unit 17," e.g. "trouver" and "decouvrir." Fushimoto, column 7, lines 18-19 (emphasis added). Therefore, the German word "finden" still corresponds to multiple French words even though some French words have been removed through the disambiguation process. Thus, the German word "finden" does not have a one-to-one correspondence with a representation in the French target language (or the English intermediate language for that matter).

Fushimoto's third embodiment, shown in Fig. 10, continues to narrow down the French words that the German word "finden" corresponds to. Fushimoto, column 7, line 24 – column 8, line 14. For example, "trouver" is still displayed as a result of the German-to-French translation but "decouvrir" has been removed. Fushimoto, column 8, lines 1-11. While Fig. 10 only shows one French word ("trouver") in column 103 corresponding to the German word ("finden"), Applicants submit this is not a one-to-one correspondence. Fig. 10 only shows a portion of the words used during the translation process as indicated by the wavy line at the bottom of Fig. 10. The specification specifically states that "the underlined ***words*** in the column 103 of Fig. 10" are displayed as the result of the German-to-French translation of the German word "finden." Fushimoto, column 8, lines 12-14 (emphasis added). Therefore, the German word "finden" still corresponds to multiple words even after the disambiguation process of the third embodiment. Thus, the German word "finden" does not have a one-to-one correspondence with a representation in the French target language (or the English intermediate language for that matter).

Applicants submit that Fushimoto II fails to cure the deficiencies of Yamauchi and Fushimoto. Accordingly, Applicants respectfully submit the obviousness rejections with respect to independent Claims 38 and 39, and the claims that depend thereon, be reconsidered and the rejections withdrawn.

Conclusion

For at least the foregoing reasons, Applicants respectfully submit the present application is in condition for allowance and earnestly solicit reconsideration of same.

The Commissioner is hereby authorized to charge deposit account 02-1818 for any fees which are due and owing.

Respectfully submitted,

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